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May 27, 2020

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Magistrate Judge Susan van Keulen
United States District Court
280 South 1st Street
Courtroom 6, 4th Fl.
San Jose, CA 95113

Re: Neo4j, Inc. v. Graph Foundation Inc. – Unopposed Motion for Leave to File Additional Exhibits to Neo4j’s Joint Statement Regarding Graph Foundation’s Discovery Deficiencies in Responses to Requests for Production Set 1, Case No.: 3:19-cv-06226-EJD

Dear Magistrate Judge van Keulen:

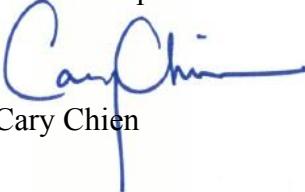
Plaintiff Neo4j, Inc. respectfully moves the Court for leave to file seven exhibits – Exhibits 1-7 to this motion – to Neo4j’s Joint Statement Regarding Graph Foundation’s Discovery Deficiencies in Responses to Requests for Production Set 1 (“Motion”), which the parties intend to file shortly. Inclusion of these exhibits is necessary to ensure that there is a complete record of the Motion (“the Exhibits”).

These Exhibits inform the Motion in that they provide factual context for the Motion or are examples of responsive documents that are in Defendant’s custody, control, or possession but have not been produced in response to the requests that are the subject of the Motion. The Motion seeks an order requiring Defendant to conduct a further diligent search for and reasonable inquiry to locate documents that it has a legal right to obtain, such as these Exhibits and other responsive documents similar to it. Some of the Exhibits will also be helpful to a second motion the parties intend to file, regarding Defendant’s deficient responses to Neo4j’s Interrogatories Set 1, as it will provide context for the information that Neo4j contends has been withheld in GFI’s responses.

Neo4j therefore requests that Exhibits 1-7 be filed as exhibits to the motions. Counsel for Neo4j has raised this leave motion with counsel for Defendant, who stated they do not oppose.

Sincerely,

HOPKINS & CARLEY
A Law Corporation


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